

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA, )

Plaintiff, )

v. )

THOMAS GREGORY ANDERSON, JR., )

Defendant. )

No. 4:14CR246 AGF/NAB

**APPLICATION FOR WRIT OF HABEAS CORPUS AD TESTIFICANDUM**

COMES NOW Defendant, Thomas G. Anderson, Jr., by and through his attorneys, William S. Margulis, Justin K. Gelfand, and the law firm of Capes, Sokol, Goodman & Sarachan, P.C., and informs the Court that there is presently in the custody of the Superintendent/Warden of MCFP Springfield, Springfield, Missouri, one **MICHAEL SARACINO** (Inmate No. 41957-044), whose testimony is necessary in order to obtain a full, complete, and proper inquiry into the allegations in a trial pending before this Court.

It is further stated that it will be necessary to temporarily remove the said witness from such custody so that the witness may testify in the trial of this cause, as well as be interviewed beforehand.

WHEREFORE, your petitioner prays this Court to issue a writ of *habeas corpus ad testificandum* directing any United States Marshal or any other authorized officer to produce on or before **JULY 24, 2017** the body of the said **MICHAEL SARACINO** (Inmate No. 41957-044), before this Court to testify in this cause, as well as be interviewed by the Defendant beforehand; and upon completion of such testimony to return the witness to present custody.

Respectfully submitted,

Capes, Sokol, Goodman & Sarachan, P.C.

/s/ William S. Margulis

WILLIAM S. MARGULIS, #37625MO

JUSTIN K. GELFAND, #62265

7701 Forsyth Blvd., 12<sup>th</sup> Floor

St. Louis, MO 63105

Telephone: 314.721.7701

Facsimile: 314.721.0554

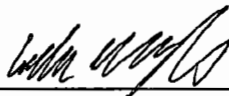
[wmargulis@capessokol.com](mailto:wmargulis@capessokol.com)

[gelfand@capessokol.com](mailto:gelfand@capessokol.com)

ATTORNEYS FOR DEFENDANT

UNITED STATES OF AMERICA           )  
Eastern Division of the                )  
Eastern District of Missouri           )

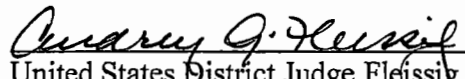
I, William S. Margulis, declare under penalty of perjury, pursuant to Title 28, United States Code, Section 1746, that the foregoing Application for Writ of Habeas Corpus Ad Testificandum is based upon statements furnished to me and that the contents therein are true and correct to the best of my knowledge and belief. Executed on the 20<sup>th</sup> day of June, 2017.

  
\_\_\_\_\_  
William S. Margulis, #37625MO  
Attorney for Defendant

TO THE CLERK OF THE DISTRICT COURT:

You are hereby ordered to issue the Writ of Habeas Corpus Ad Testificandum as prayed for in the foregoing application.

6/26/17  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
United States District Judge Fleissig

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	<b>No. 4:14CR246 AGF/NAB</b>
<b>v.</b>	)	
	)	
<b>THOMAS GREGORY ANDERSON, JR.,</b>	)	
	)	
<b>Defendant.</b>	)	

**WRIT OF HABEAS CORPUS AD TESTIFICANDUM**

**To: Superintendent/Warden, MCFP Springfield, 1900 West Sunshine Street,  
Springfield, Missouri, 65807:**

**WE COMMAND** you to produce the inmate, Michael Saracino, Inmate Number 41957-044, in your custody, to testify before the United States District Court at a trial beginning July 24, 2017, at the United States Courthouse in the Eastern District of Missouri, 111 South 10<sup>th</sup> Street, St. Louis, Missouri 63102, and from day to day until completion of the proceedings or as ordered by the court; and thereafter to return the inmate to the above institution.

**FURTHER**, you have been ordered to notify the court of any change in custody of the inmate and have been ordered to provide the new custodian with a copy of this writ.

**WTINESS**, the Honorable Audrey G. Fleissig, United States District Judge for the Eastern District of Missouri.

Greg Linhares, Clerk  
United States District Court

\_\_\_\_\_  
Date

By: \_\_\_\_\_  
Deputy Clerk